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Subject: Preliminary List of Round 2 Report Issues and Data Gaps
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Attachments: [PreliminaryRound2Issues041007.pdf](#)

Jim, Bob and Rick, attached is a preliminary list of Round 2 Report Issues and Data Gaps. This list is preliminary in nature based on an initial review of the Round 2 Report for discussion purposes only. Our review continues and we will provide more detailed comments in the future; additional review of the Round 2 Report may identify additional issues and data gaps.

EPA has provided this initial list to initiate the conversation about the steps necessary to complete data collection efforts related to the Portland Harbor RI/FS. EPA understands that the LWG has begun preparation of field sampling plans for the collection of sediment samples within and upstream of the Portland Harbor study area and the performance of bioassays in areas of indeterminate risk. These FSPs represent a good vehicle for reaching agreement on data quality objectives, sampling approach and locations and other technical aspects of the sampling program. However, as described in the attached document, EPA believes that the sampling program should be expanded to include biota tissue, and additional sampling to assess risk in areas of groundwater discharge that exceed screening criteria.

In addition to data gaps, EPA has summarized a number of areas in the report where we have questions or concerns about how the evaluation was performed or presented in the Round 2 Report. In general, as the evaluation process moved from the COPC identification screening step to the identification of iCOCs and potential iCOCs to the development of iPRGs and i AOPCs, the extent of EPA concerns increases. EPA believes that we need to reach agreement on the screening step and understand the distribution of contamination and risks relative to the screening step prior moving forward with subsequent evaluations. This is a critical step to ensure that we are starting from the same point and will assist us in finalizing data gaps for the RI/FS.

We look forward to beginning our discussion at tomorrow's management meeting.

Thanks, Eric



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